

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re FLINT WATER CASES

Civil Action No. 5:16-cv-10444-JEL-MKM
(consolidated)

Hon. Judith E. Levy
Mag. Kimberly G. Altman

APPLICABLE TO ALL CASES

VEOLIA WATER NORTH AMERICA OPERATING SERVICES, LLC’S,
VEOLIA NORTH AMERICA, INC.’S, AND VEOLIA NORTH AMERICA,
LLC’S SUBMISSION RELATED TO PIERRE FARCOT PURSUANT TO THE
NOVEMBER 30, 2022, STATUS CONFERENCE

Pursuant to the Court’s direction during the November 30, 2022, status conference, Defendants Veolia Water North America Operating Services, LLC, Veolia North America, Inc., and Veolia North America, LLC (the “VNA Defendants”) make the following submission related to Pierre Farcot.

Pursuant to the Court’s direction, the VNA Defendants requested that Veolia Environnement, S.A. (“VE”) provide the VNA Defendants with (1) information regarding any current relationship (employment, consulting, or otherwise) between Mr. Farcot and VE or any other Veolia entity, (2) the date of Mr. Farcot’s separation

from VE, and (3) VE's last known address for Mr. Farcot.

In response to the VNA Defendants' request, VE (1) confirmed that Mr. Farcot does not have any current relationship (employment, consulting, or otherwise) with VE or any other Veolia entity; (2) provided September 30, 2022, as Mr. Farcot's date of separation from VE; and (3) informed the VNA Defendants that, based on, *inter alia*, the General Data Protection Regulation, VE is unable to disclose Mr. Farcot's address without subjecting itself to the risk of sanctions.

Respectfully submitted,

MAYER BROWN LLP

/s/ Michael A. Olsen

Michael A. Olsen

71 S. Wacker Drive

Chicago, IL 60606

(312) 782-0600

molsen@mayerbrown.com

Attorneys for Veolia Water North America Operating Services, LLC, Veolia North America, LLC, and Veolia North America, Inc

Dated: December 7, 2022

CERTIFICATE OF SERVICE

I, Alaina N. Devine, one of the counsel of record for the VNA Defendants, certify that I served the within Submission Regarding Pierre Farcot on December 7, 2022, by causing it to be e-filed through the Court's CM/ECF electronic filing system which will automatically deliver electronic copies of it to counsel of record for all parties to have appeared in *In re Flint Water Cases*.

/s/ Alaina N. Devine

Alaina N. Devine

adevine@campbell-trial-lawyers.com